

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ASSURED PARTNERS OF WASHINGTON
LLC,

Plaintiff,

v.

MARK ACARREGUI and ALLIANT
INSURANCE SERVICES INC.,

Defendants.

NO. 2:20-cv-00290 BJR

**STIPULATED MOTION AND
ORDER REGARDING EXPEDITED
DISCOVERY AND PRELIMINARY
INJUNCTION BRIEFING**

Plaintiff AssuredPartners of Washington LLC (Assured), Defendant Mark Acarregui, and Defendant Alliant Insurance Services Inc. (Alliant), having come to certain agreements between them, jointly request that this Court enter an order as follows:

- (1) Expedited discovery and briefing related to Assured's motion for a preliminary injunction shall proceed according to the schedule set forth in Exhibit A.
- (2) The temporary restraining order (Dkt. 15), which by its terms is set to expire on March 20, 2020, shall continue in full force and effect until the Court rules on Assured's motion for a preliminary injunction, if such a motion is filed according to the briefing schedule set forth in Exhibit A. If no motion is filed according to that briefing schedule, the temporary restraining order shall immediately dissolve

1 unless further agreement is made by the parties or the temporary restraining order
2 is continued by the Court for good cause.

3 **EXHIBIT A**

4 **Schedule for Expedited Discovery & Preliminary Injunction Briefing**

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Deadline	Event
On or before 5 p.m. PST on March 17, 2020	Service of written discovery requests. There shall be no more than 12 document requests per side (this limitation applies collectively to requests by subpoena to third parties), and five interrogatories per side. Written discovery should be narrowly tailored to minimize potential objections and to make responses and productions on an expedited basis feasible.
On or before 5 p.m. PST on March 23, 2020	Responses to requests for production. The parties shall meet to confer about any objection to a document request within two days of service of any objection.
On or before 5 p.m. PST on March 25, 2020	Responses to interrogatories. The parties shall meet to confer about any objection within two days of service of any objection.
On or before 5 p.m. PST on March 27, 2020	Document productions. The parties shall produce all documents that are responsive to a request for production, and which are not subject to an objection, by this date.
On or before 5 p.m. PST on March 30, 2020	Service of deposition notices. There shall be two depositions per side (including third parties). The parties shall meet and confer in good faith to agree on a comprehensive deposition schedule prior to the commencement of depositions. To the extent any side seeks a Rule 30(b)(6) deposition, written objections to topics of deposition shall be served within two days of service of the deposition notice and the parties shall meet and confer regarding the objections within one day of service of the objections.

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Deadline	Event
April 7, 2020	Time to complete depositions. Each deposition shall be limited to four hours of testimony each (without prejudice to a party's ability to complete any deposition after Plaintiff's application for a preliminary injunction, if any, is adjudicated). The parties may conduct the depositions by video conference.
April 10, 2020	Plaintiff's deadline to file a motion for a preliminary injunction. Plaintiff shall file and serve its preliminary injunction papers by this date.
April 17, 2020	Defendants to oppose motion for a preliminary injunction. Defendants shall file and serve their opposition papers, if any, by this date.
April 21, 2020	Plaintiff's deadline to reply. Plaintiff shall file and serve any reply papers by this date.
April 23, 2020	Date of Hearing. Plaintiff shall note its motion for preliminary injunction for hearing on this date. The parties may appear by telephone for oral argument regarding Plaintiff's motion for preliminary injunction.

1 DATED this 13th day of March, 2020.

2 SEYFARTH SHAW LLP

3 BYRNES KELLER CROMWELL LLP

4 By /s/ Helen M. McFarland

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21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 DATED this 16th day of March, 2020.

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HONORABLE BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT COURT JUDGE

Proposed by:

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